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Acting Under Authority Conferred by 28 U.S.C. § 515

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Attorneys for the United States of America

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

RYAN BUNDY, *et al.*,

Plaintiffs,

v.

UNITED STATES OF AMERICA, *et al.*,

Defendants.

Case No. 2:23-cv-01724-RFB-VCF

**STIPULATION AND [PROPOSED] ORDER  
ALLOWING AUSA BERNARDONI TO  
APPEAR REMOTELY FOR MAY 17, 2024  
HEARING**

IT IS HEREBY STIPULATED by and between plaintiffs Ryan Bundy, *et al.* (collectively, “Plaintiffs”), and defendant the United States of America (“United States”), by and through their respective attorneys, pursuant to Local Rule 7-1 as follows:

1. On October 24, 2023, Plaintiffs initiated the above-captioned lawsuit (ECF No. 3);
2. On April 30, 2024, the United States filed a motion to dismiss the First Amended Complaint in its entirety pursuant to Federal Rule of Civil Procedure 12(b)(1) as a result of the United States’ sovereign immunity and Federal Rule of Civil Procedure 12(b)(6) for failure to state a claim upon which relief can be granted (ECF No. 12);
3. On May 3, 2024, the parties filed a stipulation to temporarily stay discovery until 30 days after the pleadings are closed (ECF No. 13);

1           4.       The Court scheduled an in-person hearing on the parties' stipulation for May 17, 2024 at  
2 10:30 a.m.;

3           5.       The United States Attorney's Office for the District of Nevada has been screened from the  
4 above-captioned case, and the undersigned counsel was assigned pursuant to 28 U.S.C. § 515 as Special  
5 Attorney to the United States Attorney General to represent the United States in this matter;

6           6.       The undersigned counsel for the United States is based in Oakland, California and, in the  
7 interest of preserving resources, seeks to attend the May 17, 2024 hearing remotely;

8           7.       Under these circumstances, the parties agree, subject to Court approval, that Special  
9 Attorney to the United States Attorney General Jevechius D. Bernardoni should be permitted to attend the  
10 May 17, 2024 hearing remotely, by Zoom, Microsoft Teams, or similar teleconferencing program, or  
11 telephonically.

12 DATED: May 14, 2024

13                               ISMAIL J. RAMSEY  
14                               United States Attorney

15                               /s/ Jevechius D. Bernardoni  
16                               JEVECHIUS D. BERNARDONI  
17                               Assistant United States Attorney  
18                               Acting Under Authority Conferred  
19                               by 28 U.S.C. § 515

20                               Attorneys for the United States of  
21                               America

22                               JUSTICE LAW CENTER

23                               /s/ Bret O. Whipple

24                               BRET O. WHIPPLE, ESQ.  
25                               Nevada Bar #6168  
26                               1100 S. Tenth Street  
27                               Las Vegas, NV 89104

28                               Attorney for Plaintiffs

**[PROPOSED] ORDER**

Pursuant to the parties' stipulation, and good cause appearing, Assistant United States Attorney Jevechius D. Bernardoni is permitted to appear remotely by \_\_\_\_\_ for the previously scheduled May 17, 2024 hearing on the parties' stipulation to temporarily stay discovery.

IT IS SO ORDERED.

Dated: \_\_\_\_\_

THE HONORABLE MAXIMILIANO D. COUVILLIER III